

Berkeley Lab Lessons Learned

JULY , 1998

Photoprocessing

Background: During a safety inspection, a photoprocessing unit was found which had not been reported to Environmental Protection or to the Division Safety Coordinator. The PI had a contract with an off-site company, Merry X-Ray, which covers monthly servicing. However, in this case Merry X-Ray had also plumbed the unit to the sink. This is normally done by LBNL plumbers, who are aware of site restrictions on discharge of fixer and developer to the sanitary sewer. Developer wastes had been plumbed directly to the sink drain. According to LBNL policy, only rinsewaters, not fixer or developer, from photoprocessing units may be discharged to the sanitary sewer. Spent fixer and developer must be collected in appropriate containers, usually plastic carboys, and disposed of properly.

Actions Taken: The line from the developer to the sink drain was immediately re-routed to a plastic carboy under the countertop. Environmental Protection sent the researcher a copy of the Accidental Spill Prevention and Containment Plan, which under the terms of the East Bay Municipal Utility District (EBMUD) Wastewater Discharge Permit should be accessible in areas with photoprocessing units. Other obligations for users of such units were also discussed with the researcher. A letter was sent to Merry X-Ray explaining LBNL policy in this area and requesting their help in ensuring that all units that they service at LBNL remain in compliance with this policy. Appropriate Division personnel were informed of the situation.

Preventive Measures: Environmental Protection is working with Purchasing to try to remain informed of all photoprocessing units onsite. The affected Division has agreed to ensure that the Safety Coordinator remains informed of the presence of photoprocessors, and report them to relevant Environmental Protection personnel. Division Safety Coordinators will need to keep Environmental Protection informed of all equipment with the potential to discharge to sink drains. This will be reinforced in the EH&S newsletter with an article reminding researchers to notify their Safety Coordinator and/or Environmental Protection when installing photoprocessors and equipment which drains to sinks.

For questions regarding wastewater discharges, contact Ginny Lackner, of the EH&S Division Environmental Protection Group, at extension 7413.